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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SEBASTIAN SYMEONIDES, an Individual;

Plaintiff,

vs.

TRUMP RUFFIN COMMERCIAL, LLC, a Foreign Limited-Liability Company d/b/a TRUMP INTERNATIONAL LAS VEGAS and TRUMP INTERNATIONAL HOTEL & TOWER LAS VEGAS; TRUMP RUFFIN TOWER I, LLC, a Foreign Limited-Liability Company; TRUMP INTERNATIONAL HOTELS MANAGEMENT, LLC, a Foreign Limited-Liability Company; OTIS ELEVATOR CORPORATION, a Foreign Corporation; DOES I through X, inclusive; and ROE BUSINESS ENTITIES I through XX inclusive,

Defendants.

CASE NO. 2:23-cv-00854-JAD-MDC

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
PLAINTIFF'S REPLY BRIEFS
REGARDING PLAINTIFF'S
MOTION FOR SANCTIONS DUE TO
DEFENDANTS' SPOILIATION OF
EVIDENCE [ECF Nos. 90 and 92]**

IT IS HEREBY STIPULATED AND AGREED, by all parties, by and through their respective counsel of record, that the deadline for Plaintiff to file reply briefs to Defendant Trump Ruffin Tower I, LLC's Opposition to Plaintiff's Motion for Sanctions Due to Defendants' Spoliation of Evidence [ECF No. 109] and Defendant Otis Elevator Company's Points and Authorities in Response to Plaintiff's Motion for Sanctions Due to Spoliation of Evidence [ECF No. 110], currently due May 29, 2025, shall be extended to June 5, 2025.



The parties respectfully request a one-week extension of the deadline for Plaintiff to file reply briefs to Defendants' oppositions to his Motion for Sanctions Due to Defendants' Spoliation of Evidence. Good cause exists for this request because the oppositions involve complex legal and factual issues, and additional time is needed to fully and completely respond to each issue. Properly responding to both oppositions requires a thorough review of extensive records, expert reports, deposition testimony, and case law to ensure the Court receives well-reasoned and comprehensive arguments. Extending the deadline will ensure adequate time for Plaintiff to research the relevant legal issues and fully respond to the arguments raised in Defendants' opposition briefs, ensuring that the Court has the full context to make an informed decision.

Notably, the parties previously agreed to a two-week extension for Defendants to file their oppositions, which the Court approved. ECF No. 108. Plaintiff makes this request in good faith and not for purposes of delay, and believes that a brief extension will aid the Court by allowing Plaintiff to prepare thorough and focused reply briefs. No party will be prejudiced by the requested extension.

Dated this 28th day of May, 2025

Respectfully Submitted By:
CHRISTIANSEN TRIAL LAWYERS

/s/ Keely P. Chippoletti

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10 *I, LLC, erroneously sued herein as Trump*
11 *Ruffin Commercial, LLC, d/b/a Trump*
12 *International Vegas and Trump International*
13 *Hotel & Tower Las Vegas; and Trump*
14 *International Hotels Management, LLC*

15 **ORDER**

16 IT IS SO ORDERED that the deadline for Plaintiff to file reply briefs to Defendant Trump
17 Ruffin Tower I, LLC's Opposition to Plaintiff's Motion for Sanctions Due to Defendants'
18 Spoliation of Evidence [ECF No. 109] and Defendant Otis Elevator Company's Points and
19 Authorities in Response to Plaintiff's Motion for Sanctions Due to Spoliation of Evidence [ECF
20 No. 110], currently due May 29, 2025, is hereby extended to June 5, 2025..

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22 
23 United States Magistrate Judge

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25 Dated: 5-30-25
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